

# Exhibit F

Deposition Transcript of K.N.

**GORE, et al.**

**vs.**

**LEE, et al.**

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**K.N.**

**May 12, 2020**



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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE MIDDLE DISTRICT OF TENNESSEE  
3                   AT NASHVILLE

4                   KAYLA GORE; L.G.; and K.N.,

5                   Plaintiffs,

6                   vs.

Case No. 3:19-CV-00328

7                   WILLIAM BYRON LEE, in his official  
8                   capacity as Governor of the State of  
9                   Tennessee; and LISA PIERCEY, in her  
10                  official capacity as commissioner of the  
11                  Tennessee Department of Health,

12                  Defendants.

13  
14  
15                  Teleconference Deposition of:

16                  K.N.

17                  Taken on behalf of the Defendants  
18                  May 12, 2020

19  
20  
21  
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4                   The teleconference deposition of K.N. was

5 taken by counsel for the Defendants, with all

6 participants appearing at their respective locations,

7 on May 12, 2020, for all purposes under the Federal

8 Rules of Civil Procedure.

9                   All formalities as to caption, notice,

10 statement of appearance, et cetera, are waived. All

11 objections, except as to the form of the questions,

12 are reserved to the hearing, and that said deposition

13 may be read and used in evidence in said cause of

14 action in any trial thereon or any proceeding herein.

15                  It is agreed that JENNIFER CHECUGA, LCR, RPR,

16 and Court Reporter for the State of Tennessee, may

17 swear the witness, and that the reading and signing

18 of the completed deposition by the witness are not

19 waived.

20

21

22

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\* \* \*

MR. JONES: I am Matt Jones, District Attorney General of the State of Tennessee. I am joined today by my colleagues, Sara Sedgwick and Jae Lim, both representing the Defendants. And Puneet, if you want to introduce everyone or they want to try to introduce themselves.

MR. KOHLI: Sure. So I am Puneet Kohli on behalf of the Plaintiffs. I'll be the one making the objections on the record. I think I'll let people just introduce themselves.

MS. BORELLI: This is Tara Borelli with Lambda Legal, also on behalf of the Plaintiffs.

MR. GONZALEZ-PAGAN: This is Omar Gonzalez-Pagan with Lambda Legal on behalf of the Plaintiffs.

MR. JONES: Great. Thank you. Kathryn?

MS. CHRISTOPHERSON: This is Kathryn Christopherson with Baker Botts on behalf of the Plaintiffs.

MR. JONES: So it looks like everyone is logged in, so -- and it looks like everyone is muted except myself and Puneet and the witness. So just a couple of housekeeping matters before we get started.

One, we have a stipulation that the



1 witness can be sworn remotely, as if she was sworn in  
2 person, and all objections are reserved except as to  
3 form.

4 A couple things for counsel and just for  
5 the witness's benefit before we get started.  
6 Obviously, we're doing this by video conference and  
7 there's a little bit of a delay between when words  
8 are spoken and when the sound actually comes through.  
9 So I will do my best to speak slowly and clearly.  
10 I'm using my headphones, so it's a little weird for  
11 me to hear the voice in my head, but I'm trying, but  
12 it'll cut down on feedback.

13 And also, after I ask a question, if the  
14 witness would give Puneet an opportunity to make an  
15 objection, if he does object, that's just for the  
16 record. And unless he instructs you not to answer,  
17 you can go ahead and answer the question after he  
18 poses his objection. And then I will likewise try to  
19 do my best to not begin speaking again until you've  
20 completed your answer. But if you need additional  
21 time to clarify something, just let me know.  
22 Obviously, we're here under a little bit trying  
23 circumstances, but we'll do our best.

24 Puneet, do you have anything to add  
25 before we swear the witness?

1 MR. KOHLI: Yeah. I think I just want to 01:17:38  
2 go ahead and make a standing objection if you agree 01:17:39  
3 to omit the disputed terms of art of biological sex, 01:17:43  
4 gender, you know, dysphoria, things like that which 01:17:45  
5 would cause needless trigger. Do you agree to a 01:17:48  
6 standing objection? 01:17:54

7 MR. JONES: Yes. I believe that 01:17:54  
8 objection has been made throughout the depositions, 01:17:56  
9 so I understand the objection. 01:17:58

10 MR. KOHLI: Okay. Sounds good. 01:18:00

11 MR. JONES: So if the court reporter 01:18:04  
12 could swear in the witness. 01:18:07

13

14 \* \* \*

15 K.N.,  
16 was called as a witness, and having first been duly  
17 sworn, testified as follows:

18

19 EXAMINATION

20 QUESTIONS BY MR. JONES:

21 Q. Okay. I introduced myself previously. My 01:18:24  
22 name is Matt Jones. I'm a district attorney general. 01:18:27  
23 I'll be asking you questions today. I understand 01:18:31  
24 that you're proceeding as a plaintiff in this case 01:18:34  
25 under a pseudonym by initials, and so this will be 01:18:37

1 redacted, but I would ask you to go ahead and 01:18:43  
2 identify yourself by your full name. 01:18:46  
3 A. My full name is K.N. 01:18:47  
4 Q. Right. And I'm not trying to be rude, I'll 01:18:55  
5 just try not to use your name just so the court 01:18:58  
6 reporter doesn't have to redact that. I'm not being 01:19:01  
7 rude by not using your name, just wanted you to be 01:19:06  
8 aware of that. 01:19:10  
9 A. Thank you. 01:19:11  
10 Q. Have you ever been in a deposition before? 01:19:11  
11 A. No, I have not. 01:19:15  
12 Q. Okay. Well, let me just explain. This is 01:19:16  
13 our one and only opportunity to ask you questions 01:19:20  
14 about your allegations in this lawsuit and kind of 01:19:25  
15 the background of your life as it were. 01:19:30  
16 Again, if we can just try to cooperate with 01:19:37  
17 each other. I know it's a little unusual because I'm 01:19:41  
18 not looking at the screen -- I'll be in a different 01:19:44  
19 screen. So just let me know if there's something you 01:19:47  
20 don't understand, if you need me to clarify a 01:19:50  
21 question, I'll be happy to do that. Fair enough? 01:19:52  
22 A. Okay. 01:19:55  
23 Q. Great. 01:19:56  
24 And you've given me your name. And do I 01:19:59  
25 understand correctly that you live in [REDACTED]? 01:20:03

1	A.	Yes, I do.	01:20:07
2	Q.	How long have you been in [REDACTED]?	01:20:08
3	A.	I have lived in [REDACTED] since late	01:20:13
4		2012.	01:20:18
5	Q.	And you are a software engineer?	01:20:20
6	A.	Yes, I am.	01:20:27
7	Q.	Are you employed or are you an independent	01:20:29
8		contractor?	01:20:33
9	A.	I'm employed.	01:20:34
10	Q.	And how long have you been employed with that	01:20:39
11		same employer?	01:20:42
12	A.	I have been at my current employer since	01:20:43
13		October of 2019.	01:20:55
14	Q.	October 2019? I'm sorry, you kind of broke	01:20:56
15		up.	01:21:01
16	A.	Yes, October 2019.	01:21:01
17	Q.	Okay. And prior to that, were you employed	01:21:03
18		by another employer?	01:21:07
19	A.	Yes, I was.	01:21:09
20	Q.	How long were you in that previous job?	01:21:12
21	A.	I don't remember the exact amount of time,	01:21:20
22		but it was a year and a few months.	01:21:25
23	Q.	How many employers have you had since you	01:21:28
24		moved to [REDACTED] in 2012?	01:21:36
25	A.	Six.	01:21:39

1	Q.	And are you married?	01:22:03
2	A.	No.	01:22:09
3	Q.	Are you currently in a relationship with	01:22:12
4		anyone?	01:22:16
5	A.	Yes.	01:22:17
6	Q.	Your person that you're in a relationship	01:22:20
7		with, what is their gender identity?	01:22:34
8		MR. KOHLI: Objection, form.	01:22:38
9		BY MR. JONES:	01:22:41
10	Q.	You may answer.	01:22:41
11	A.	She is female.	01:22:47
12	Q.	Is she transgender female or is she cisgender	01:22:49
13		female?	01:22:56
14	A.	She is transgender female.	01:22:58
15	Q.	How long have you been in a relationship?	01:23:09
16	A.	Since March 2018.	01:23:16
17	Q.	Now, I provided your counsel with two	01:23:28
18		exhibits that I am going to be referring to today. I	01:23:40
19		provided those to the court reporter, as well.	01:23:45
20		Did you get those two documents and do you	01:23:49
21		have them there with you?	01:23:51
22	A.	Can you be more specific?	01:23:53
23	Q.	Yes. The first exhibit that I identified is	01:23:57
24		the amended complaint.	01:24:03
25	A.	Yes, I have the amended complaint.	01:24:13

1 Q. Okay. And if you would look down in the 01:24:15  
2 amended complaint to Paragraph 148, which I believe 01:24:19  
3 is on Page 29. 01:24:24

4 A. Okay. I have it. 01:24:41

5 Q. And from Paragraph 148 to -- scrolling down 01:24:44  
6 through Paragraph 170, a plaintiff identified as 01:24:52  
7 K.N.; is it your understanding that that K.N. refers 01:24:59  
8 to you? 01:25:02

9 A. Yes. 01:25:03

10 Q. Okay. And the second document that I 01:25:07  
11 identified is titled Declaration of K.N. in Support 01:25:12  
12 of Plaintiff's Motion for Summary Judgement. Do you 01:25:18  
13 have that document in front of you? 01:25:21

14 A. Yes. This would be Exhibit 6? 01:25:23

15 Q. Yes, Exhibit 6 to the motion for summary 01:25:29  
16 judgement, but it will be Exhibit 2 to the deposition 01:25:31  
17 today. 01:25:34

18 And looking down at Page 4, does that appear 01:25:36  
19 to be a document that you signed or initialled on the 01:25:40  
20 27th of February, 2020? 01:25:45

21 A. Yes. 01:25:50

22 Q. Great. 01:25:52

23 (WHEREUPON, documents were marked as 01:25:52  
24 Exhibit Number 1 and Exhibit Number 2.)

1 BY MR. JONES:

2 Q. And if you'll just kind of keep those in 01:25:53  
3 front of you, I'm going to try to use those documents 01:25:55  
4 as sort of a roadmap for what I'm going to discuss 01:25:59  
5 with you today, okay? 01:26:04

6 A. Okay. 01:26:05

7 Q. So according to Exhibit 2, which I'll call 01:26:07  
8 the affidavit of declaration, says you were born and 01:26:15  
9 raised in [REDACTED], Tennessee; is that correct? 01:26:20

10 A. Yes. 01:26:23

11 Q. And how long did you live in [REDACTED], 01:26:27  
12 Tennessee? 01:26:32

13 A. I lived there full time until I was 16. 01:26:34  
14 After 16, I believe that was still my residence until 01:26:53  
15 I was 18 or 19. I forget -- at some point, I went to 01:27:00  
16 college and I forget what my legal residence was. 01:27:05

17 Q. Where did you move when you were 16? 01:27:08

18 A. I went to a boarding school. 01:27:12

19 Q. Where was that located? 01:27:18

20 A. That was located in [REDACTED]. 01:27:20

21 Q. Was it a coed boarding school for a single 01:27:26  
22 sex boarding school? 01:27:38

23 A. It was coed. 01:27:43

24 Q. And prior to going to that boarding school in 01:27:44  
25 [REDACTED], where did you go to school in [REDACTED] 01:27:48

1 [REDACTED]? 01:27:53

2 A. I went to the [REDACTED] public school system. 01:27:53

3 I was at [REDACTED]. 01:28:01

4 Q. Let's kind of separate those two. The [REDACTED] 01:28:06

5 [REDACTED] let's talk about it first. 01:28:13

6 When you were at [REDACTED], did 01:28:17

7 you participate in any extracurricular activities at 01:28:23

8 the school? 01:28:27

9 A. Yes, I believe I did; however -- yes, I did. 01:28:36

10 Q. Okay. What were those? 01:28:50

11 MR. KOHLI: Could you repeat the 01:28:51

12 question? I didn't hear that. 01:28:53

13 BY MR. JONES: 01:28:53

14 Q. I just said, what were those? 01:28:56

15 A. I was a member of the Young Democrats. I 01:29:01

16 don't remember too well what I was involved with. I 01:29:07

17 may have been involved in that. 01:29:09

18 Q. Did you date while you were at [REDACTED] 01:29:26

19 [REDACTED]? 01:29:31

20 MR. KOHLI: I'm sorry, I didn't hear you. 01:29:31

21 Could you repeat the question? 01:29:31

22 MR. JONES: Yes, I asked if he dated -- 01:29:34

23 or she dated, I'm sorry, if she dated when she was in 01:29:36

24 high school. 01:29:39

25 THE WITNESS: No, I did not. 01:29:40



1 BY MR. JONES: 01:29:41

2 Q. And onto the boarding school in 01:29:41

3 [REDACTED], did you engage in extracurricular 01:29:47

4 activities there? 01:29:50

5 A. No; however, the school had programming that 01:30:01

6 would have educational material that could have 01:30:12

7 been -- 01:30:17

8 THE REPORTER: I'm sorry, can you please 01:30:17

9 repeat your answer? 01:30:18

10 THE WITNESS: No, because I would 01:30:24

11 consider any activities outside of academic materials 01:30:26

12 to be part of the overall school. 01:30:32

13 BY MR. JONES: 01:30:34

14 Q. I understand. 01:30:35

15 And was there any -- well, what was the 01:30:35

16 purpose of you going to the boarding school in 01:30:40

17 [REDACTED] as opposed to staying at the public 01:30:43

18 school in [REDACTED]? 01:30:46

19 MR. KOHLI: Objection, form. 01:30:52

20 BY MR. JONES: 01:30:56

21 Q. You can answer. 01:30:56

22 A. Could you be more specific? 01:30:58

23 Q. Sure. For example, was it purely academic 01:30:59

24 reasons or were there any other reasons that you went 01:31:03

25 to -- moved away from home to go to boarding school? 01:31:08

1 MR. KOHLI: Objection, form. 01:31:17

2 THE WITNESS: The school program was 01:31:35

3 therapeutic in nature. [REDACTED] 01:31:37

4 [REDACTED] 01:31:42

5 [REDACTED] 01:31:46

6 [REDACTED] 01:31:53

7 [REDACTED] 01:31:56

8 [REDACTED] 01:32:00

9 [REDACTED] 01:32:06

10 [REDACTED] 01:32:09

11 [REDACTED] 01:32:15

12 BY MR. JONES: 01:32:18

13 Q. And so that leads me to Exhibit 2, the 01:32:18

14 affidavit or the declaration. Paragraph 6, it 01:32:23

15 states, "Although I did not identify as transgender 01:32:29

16 until my adulthood, I was always uncomfortable with 01:32:34

17 my assigned gender at birth." 01:32:37

18 Did I read that correctly? 01:32:40

19 A. Yes. 01:32:41

20 Q. And my question is if you could explain what 01:32:46

21 you mean by uncomfortable and whether -- well, if you 01:32:50

22 could just explain that. 01:32:56

23 A. I would say I never really felt any 01:32:59

24 connection to the gender identity that I was assigned 01:33:13

25 at birth. I felt it was largely pushed upon me by 01:33:17

1 others. And when I began expressing in more 01:33:23  
2 effeminate ways, I was harassed by both children and 01:33:27  
3 adults. I felt a great deal of discomfort and I felt 01:33:35  
4 a great need to hide who I was and I felt a great 01:33:40  
5 deal of uncertainty then of who I was. 01:33:45

6 Q. And did that change at all after you moved to 01:33:49  
7 the boarding school? 01:33:55

8 A. I would say that the boarding school removed 01:33:57  
9 me from an environment that was in some ways much 01:34:10  
10 more hateful and negative towards me. 01:34:14

11 On the other hand, I was forced to do things 01:34:22  
12 in order to conform for fear of being made homeless 01:34:23  
13 or sent to more restrictive programs, such as cut my 01:34:27  
14 hair. And I felt a lot of activities at the boarding 01:34:33  
15 school were designed to make me conform to a certain 01:34:39  
16 gender that were less effeminate and... 01:34:45

17 Q. So at that time, I believe you testified that 01:34:56  
18 your parents decided to send you to the boarding 01:35:06  
19 school. Were your parents being supportive of you at 01:35:12  
20 that time? 01:35:18

21 MR. KOHLI: Objection, form. 01:35:18

22 THE WITNESS: Can you explain what you 01:35:30  
23 mean more? 01:35:33

24 BY MR. JONES: 01:35:33

25 Q. Yes. Did you think your parents were being 01:35:33

1 supportive and trying to help you with, I think you  
2 called it the uncomfortable or the social anxiety  
3 issues you were having?

4 MR. KOHLI: Objection, form.

5 THE WITNESS: I'm not my parents. I  
6 can't speak for them. I do not think it was  
7 necessarily the form of support that I needed at that  
8 time.

9 BY MR. JONES:

10 Q. Are your parents still alive?

11 A. Yes.

12 Q. And do they still live in [REDACTED]?

13 A. Yes, I believe so.

14 Q. Okay. Do you still talk to them?

15 A. Infrequently. I'm in a little bit of contact  
16 with them.

17 Q. Do you have any siblings?

18 A. No, I do not.

19 Q. And I don't think I asked this question about  
20 the boarding school.

21 After you moved to the boarding school --  
22 first of all, did you complete high school at the  
23 boarding school?

24 MR. KOHLI: Objection, form.

25 THE WITNESS: Can you be more specific?

1 BY MR. JONES:

01:37:09

2 Q. Did you graduate from there?

01:37:09

3 A. Yes.

01:37:11

4 Q. That time that you were at the boarding  
5 school, did you date?

01:37:12

01:37:17

6 A. No.

01:37:19

7 Q. After you graduated the boarding school, did  
8 you go back to [REDACTED]?

01:37:25

01:37:57

9 A. Yes, I did. For the next two summers, I had  
10 an internship at [REDACTED].

01:37:59

01:38:11

11 Q. And so when did you start college?

01:38:11

12 THE REPORTER: I'm sorry. Where did he  
13 have internship at?

01:38:11

01:38:11

14 THE WITNESS: I had a -- I was in -- in a  
15 program, an internship program of sorts at [REDACTED]

01:38:28

01:38:28

16 [REDACTED].

01:38:32

17 BY MR. JONES:

01:38:35

18 Q. And you said that was during the summers.  
19 What did you do for the rest of the time?

01:38:35

01:38:38

20 MR. KOHLI: Objection, form.

01:38:46

21 THE WITNESS: Can you clarify that?

01:38:48

22 BY MR. JONES:

01:38:51

23 Q. Yeah, I believe you said -- and I may have  
24 misheard, but I believe you said that you had an  
25 internship for two summers at [REDACTED].

01:38:52

01:38:54

01:38:58

1	What did you do during the time that was not	01:39:00
2	summer?	01:39:03
3	MR. KOHLI: Objection, form.	01:39:05
4	THE WITNESS: I'm not sure what time	01:39:07
5	period you're referring to.	01:39:10
6	BY MR. JONES:	01:39:12
7	Q. Okay. So after you moved back to [REDACTED]	01:39:12
8	after graduating high school, did you have an	01:39:15
9	internship that following summer?	01:39:19
10	A. Yes.	01:39:22
11	Q. How long was that internship?	01:39:24
12	A. I don't recall the full length of the	01:39:26
13	program, but it was most of my summer.	01:39:33
14	Q. Okay. And then after that ended for most of	01:39:35
15	the summer, what did you do then? Were you employed	01:39:40
16	or did you go back to school?	01:39:44
17	A. First summer -- after the first summer, I	01:39:46
18	started school. And the next summer after my first	01:39:52
19	year of college, I went back to school.	01:39:55
20	Q. Okay. So you started college after that	01:39:57
21	first summer internship?	01:40:03
22	A. Yes.	01:40:06
23	Q. Where?	01:40:10
24	A. [REDACTED]	01:40:11
25	Q. And your declaration states that you attended	01:40:17

1 [REDACTED], but you studied computer 01:40:43  
2 science. 01:40:49  
3 Did you graduate from [REDACTED] 01:40:49  
4 [REDACTED] 01:40:51  
5 MR. KOHLI: Objection, form. 01:40:55  
6 THE WITNESS: Could you be more specific? 01:40:57  
7 BY MR. JONES: 01:41:07  
8 Q. Yes. Did you receive a degree from [REDACTED] 01:41:08  
9 [REDACTED]? 01:41:11  
10 A. No, I did not. 01:41:12  
11 Q. Do you have any college degrees? 01:41:16  
12 A. No, I do not. 01:41:26  
13 Q. How long were you at [REDACTED] 01:41:36  
14 [REDACTED]? 01:41:38  
15 A. I don't remember exact terms, but I was there 01:41:39  
16 for three years. 01:41:52  
17 Q. Was there any reason that you did not 01:41:53  
18 complete your degree at [REDACTED]? 01:42:01  
19 MR. KOHLI: Objection, form. 01:42:07  
20 THE WITNESS: Can you be more specific? 01:42:10  
21 BY MR. JONES: 01:42:11  
22 Q. Yes. Why did you decide to leave [REDACTED] 01:42:12  
23 [REDACTED] before obtaining a degree? 01:42:16  
24 A. I don't have a great recollection of exactly 01:42:25  
25 what my reasonings were. The basics were that I was 01:42:42

1 really in a -- I was not doing well emotionally. I 01:42:45  
2 just did not feel like I was fitting well into the 01:42:51  
3 environment. And I felt like a lot of these issues 01:42:53  
4 around gender were beginning to express themselves 01:42:56  
5 more. 01:42:59

6 I didn't have a great sense of who I was. I 01:43:01  
7 was struggling to keep my life together. It's a very 01:43:04  
8 intense academic environment, and I was finding that 01:43:09  
9 I had enough skills in engineering and business 01:43:13  
10 administration that I would be able to have a career 01:43:20  
11 without finishing the program. 01:43:24

12 Q. And so, what year -- and I'm just trying to 01:43:26  
13 get a time frame in my head without doing the math. 01:43:30  
14 I'm terrible at that. What year was it that you left 01:43:34  
15 [REDACTED]? 01:43:37

16 A. I believe it was in 2009. 01:43:39

17 Q. Okay. So you testified that you moved to [REDACTED] 01:43:49  
18 [REDACTED] in 2012. Where did you live from 2009 to 01:43:57  
19 2012? 01:44:01

20 A. I continued to live in [REDACTED]. 01:44:02

21 Q. Did you live in [REDACTED] until you moved to 01:44:07  
22 [REDACTED]? 01:44:14

23 A. Yes, I did. 01:44:16

24 Q. And did you have [REDACTED] driver's 01:44:20  
25 license? 01:44:22



1	A.	No, I did not.	01:44:22
2	Q.	Okay. Did you continue -- did you have a	01:44:28
3		driver's license while you lived in [REDACTED]?	01:44:31
4	A.	Yes, I did.	01:44:36
5	Q.	What state issued that driver's license?	01:44:37
6	A.	Tennessee.	01:44:40
7	Q.	Okay. I'm looking back at Paragraph 6 of	01:44:43
8		your declaration. The next sentence after the one I	01:45:05
9		read previously says, "Following a lengthy internal	01:45:10
10		process of accepting my gender identity, I fully	01:45:14
11		recognized myself in 2016 and I am transgender."	01:45:18
12		If you could, please explain what that	01:45:24
13		lengthy internal process of accepting your gender	01:45:27
14		identity involved.	01:45:31
15	A.	I would say it was on a lot of fronts. One,	01:45:37
16		I didn't really understand what it meant to be	01:45:45
17		transgender. I did not know any details of	01:45:51
18		transition, and I had only negative ideas that I had	01:45:54
19		gained just from media and other sources that	01:46:04
20		generally portray trans people to be very fairly	01:46:06
21		negative. So it's impossible to have a future with a	01:46:11
22		whole lot of negative stereotypes.	01:46:14
23		I would say, too, I had a great deal of	01:46:16
24		personal shame and fear around expressing myself in	01:46:20
25		any way that was effeminate, particularly given my	01:46:25

1 childhood. I had put up a few walls in adulthood in  
2 order to survive, and I felt a great deal of fear of  
3 adjusting those at all.

4 I was also recognizing that I was in a great  
5 deal of personal pain and I was -- as I moved into  
6 adulthood further, I was seeing that more clearly.  
7 And I was seeing that I was struggling in many  
8 aspects of my personal life and that the only thing  
9 that was meaningful to me was my career.

10 I began personally expressing myself more at  
11 home in feminine ways. I would dress when I was  
12 alone and I began to avoid people more, simply  
13 because I was uncomfortable. It was like I was  
14 wearing a mask in public.

15 I eventually was coming to a point of  
16 accepting the difficulties of transition and to  
17 accepting myself as transgender being what ultimately  
18 happens.

19 Q. And the next paragraph is, "Around that same  
20 time in 2016, my mental health provider diagnosed me  
21 with gender dysphoria."

22 My question is, when did you first start to  
23 see a mental health provider?

24 A. Can you be more specific?

25 Q. Sure. Well, let's start with that mental

1 health provider, because you seem to refer to one 01:48:31  
2 mental health provider that you were seeing at least 01:48:35  
3 in 2016. 01:48:37

4 How long -- when did you first see that 01:48:39  
5 mental health provider? 01:48:43

6 A. I first started seeing her in 2016. I was 01:48:45  
7 beginning -- I was avoidant of medical professionals 01:48:56  
8 in general before that time, given my childhood 01:49:01  
9 experiences, particularly with therapists. And I was 01:49:04  
10 seeing that I was likely trans at that time and 01:49:07  
11 wanted to pursue treatment and understand the 01:49:13  
12 dysphoria that I was feeling. 01:49:19

13 I saw her in early 2016 and I saw her for -- 01:49:21  
14 I forget the full term, but a few months before I 01:49:28  
15 fully had that diagnosis. 01:49:31

16 Q. And what was your previous experience with 01:49:32  
17 therapists? 01:49:36

18 MR. KOHLI: Objection, form. 01:49:37

19 THE WITNESS: Can you be more specific? 01:49:38

20 BY MR. JONES: 01:49:42

21 Q. Yes. You just testified that you were 01:49:43  
22 sceptical of medical professionals because of your 01:49:47  
23 prior history with therapists. And I'm just 01:49:51  
24 wondering what that history was, if you could 01:49:54  
25 explain. 01:49:58

1	MR. KOHLI: Objection, form.	01:50:00
2	THE WITNESS: It was largely around my	01:50:02
3	childhood experiences before I went to the boarding	01:50:11
4	school and at that boarding school, which was	01:50:15
5	intended to be therapeutic.	01:50:18
6	BY MR. JONES:	01:50:20
7	Q. At what age did you start seeing a therapist?	01:50:21
8	A. I don't recall exactly, but I believe it	01:50:25
9	would have been when I was 12 or 13.	01:50:36
10	Q. And at that time, when you started seeing	01:50:40
11	this therapist around 12 or 13, did any therapist	01:50:50
12	give you any sort of diagnosis of the issues you were	01:50:58
13	having?	01:51:11
14	A. Yes, I received a number of diagnoses. I	01:51:12
15	think the most central ones were social anxiety,	01:51:27
16	general anxiety disorder, and depression.	01:51:31
17	Q. And I'm not talking about a medical	01:51:44
18	diagnosis, but just of your experience. Do you	01:51:50
19	believe that the social anxiety, general anxiety	01:51:56
20	disorder and/or depression related to your later	01:52:01
21	diagnosis of gender dysphoria?	01:52:07
22	MR. KOHLI: Objection, form.	01:52:10
23	THE WITNESS: What do you mean by	01:52:12
24	related?	01:52:21
25		

1 BY MR. JONES:

2 Q. Well, again, I'm not asking for a medical  
3 opinion, just your personal opinion, if you think  
4 those diagnoses at 12 or 13 had any sort of  
5 relationship to what later was diagnosed as gender  
6 dysphoria.

7 MR. KOHLI: Objection, form, calls for  
8 legal conclusion.

9 BY MR. JONES:

10 Q. You may answer, if you can.

11 A. I'm not a medical expert. I'm certainly  
12 aware of the fact that it's a common co-occurrence  
13 with gender dysphoria. I personally felt the  
14 greatest relief of symptoms in my life when I started  
15 HRT from anxiety. I believe anxiety stems from a  
16 number of locations, and I certainly believe that  
17 gender dysphoria for myself was likely involved.

18 Q. And just for the record, what is HRT?

19 A. Hormone replacement therapy.

20 Q. And did you start that in 2016?

21 A. Yes, I did.

22 Q. And so what's the name of the mental health  
23 provider who diagnosed you with gender dysphoria?

24 A. [REDACTED].

25 Q. And is [REDACTED], I assume, in [REDACTED]

1 [REDACTED]? 01:54:29

2 MR. KOHLI: Objection, form. 01:54:29

3 THE WITNESS: At the time that I saw her, 01:54:34

4 she was in [REDACTED]. 01:54:37

5 BY MR. JONES: 01:54:38

6 Q. And when was the last time you saw 01:54:40

7 [REDACTED]? Is she a doctor, [REDACTED]? 01:54:43

8 A. Yes, she holds a PhD. 01:54:47

9 Q. Okay. And when was the last time you saw 01:54:49

10 [REDACTED]? 01:54:53

11 A. I don't recall exactly. I believe a year 01:54:56

12 ago, maybe longer. 01:55:00

13 Q. And is there any reason that you have not 01:55:05

14 seen [REDACTED] in a year? 01:55:14

15 MR. KOHLI: Again, objection, form. 01:55:22

16 THE WITNESS: Can you be more specific 01:55:29

17 with your question? 01:55:30

18 BY MR. JONES: 01:55:31

19 Q. Yes. Have you completed whatever medical 01:55:31

20 treatment that you were seeing [REDACTED] for? 01:55:36

21 A. I stopped seeing her largely due to just 01:55:42

22 difficulties reaching her office. At that time, we 01:56:07

23 had scaled off therapy as I had gotten over many of 01:56:14

24 the hurdles I had struggled with. I'm -- I don't 01:56:22

25 know if I would agree with the term "completing 01:56:26

1 therapy" or "completing treatment."

01:56:29

2 Q. Have you seen another mental health provider  
3 after [REDACTED]?

01:56:31

01:56:35

4 A. Yes, I have.

01:56:37

5 Q. Who?

01:56:37

6 A. I started that relatively recently. Her name  
7 is [REDACTED]. I don't recall her last name at this time.  
8 I've been seeing her for reasons unrelated to gender  
9 dysphoria.

01:56:37

01:56:47

01:56:52

01:56:59

10 Q. And what are those reasons?

01:56:59

11 MR. KOHLI: Objection, form.

01:57:02

12 BY MR. JONES:

01:57:12

13 Q. Actually, strike that. You said they were --  
14 they're unrelated to gender dysphoria, correct?

01:57:12

01:57:14

15 A. Yes.

01:57:17

16 Q. Okay. That's fair enough.

01:57:18

17 And so looking back through both the  
18 complaint and your declaration, you began the process  
19 of transitioning in 2016; is that correct?

01:57:30

01:57:34

01:57:39

20 A. Yes.

01:57:42

21 MR. KOHLI: Objection, form.

01:57:46

22 BY MR. JONES:

01:57:47

23 Q. Okay. And according to Paragraph 11 of your  
24 declaration, it states you also updated your identity  
25 documents, including your driver's license, Social

01:57:48

01:57:52

01:57:59

1 Security records, and passport; is that correct? 01:58:01

2 A. Yes, I began that in 2016 and completed it in 01:58:10

3 2017. 01:58:18

4 Q. Okay. And I just want to go into some detail 01:58:19

5 about that. What did you update first? 01:58:22

6 A. I pursued the court order for the name and 01:58:29

7 gender change. 01:58:44

8 Q. Okay. And then of the identity documents 01:58:45

9 that you mentioned here in your declaration, your 01:58:48

10 driver's license, Social Security records, and 01:58:51

11 passport, which of those three did you have updated 01:58:54

12 first? 01:58:58

13 A. I believe Social Security records. 01:59:01

14 Q. And what was -- if you could, just explain 01:59:08

15 what that process involved. 01:59:10

16 A. I don't recall the exact details of what the 01:59:12

17 process was at the time, but I went to the Social 01:59:20

18 Security office with the court order and my identity 01:59:24

19 documents, including my birth certificate, and went 01:59:28

20 through a process with the Social Security office. 01:59:32

21 Q. Was that there in [REDACTED]? 01:59:36

22 A. Yes. 01:59:39

23 Q. And was that process easy or difficult? 01:59:41

24 MR. KOHLI: Objection, form. 01:59:47

25 THE WITNESS: Administratively compared 01:59:51



1 to passport or driver's license, it was the easiest  
2 of the three. I would say in terms of difficulty, it  
3 was quite difficult.

4 I had to present my birth certificate  
5 with my incorrect name and incorrect gender, and I  
6 had to explain myself and I had to explain  
7 Tennessee's policy around this. I think that was  
8 particularly relevant in [REDACTED] where birth  
9 certificates can be updated relatively easily as part  
10 of the court order process.

11 BY MR. JONES:

12 Q. Do you recall any negative interactions with  
13 the staff at Social Security Administration over  
14 changing those documents?

15 MR. KOHLI: Objection, form.

16 THE WITNESS: What do you mean by  
17 negative interactions?

18 BY MR. JONES:

19 Q. Well, do you recall any details of  
20 interactions with Social Security Administration that  
21 you viewed as negative?

22 A. Yeah. I'd say some were sceptical of my  
23 birth certificate in particular. It was a while ago,  
24 so I don't remember all details of that, but I  
25 remember leaving with some uncertainty if I would

1 actually be able to see my documents updated. I felt 02:01:38  
2 somewhat judged at the time, and I found the whole 02:01:42  
3 negative -- I found every aspect of explaining 02:01:49  
4 Tennessee's policy in that instance to be negative. 02:01:54

5 Q. But was anyone -- any of the staff rude to 02:01:56  
6 you or did anyone make any comments that you remember 02:02:04  
7 in particular, or do you just have a general memory 02:02:08  
8 of the process? 02:02:11

9 A. I don't recall any specific comments. I 02:02:12  
10 remember it being a little tough for me. 02:02:20

11 Q. And Paragraph 20 -- well, first, next 02:02:29  
12 question, after your Social Security records, which 02:02:40  
13 did you pursue next, the driver's license or the 02:02:45  
14 passport? 02:02:48

15 A. I don't recall. 02:02:55

16 Q. Okay. Well, let's just see what you can 02:02:56  
17 remember about both processes separately. Because 02:03:02  
18 looking at Paragraph 20 of your declaration, it says 02:03:09  
19 you have "faced invasive questioning when updating my 02:03:18  
20 driver's license and passport," and I'm wondering 02:03:22  
21 if -- what details you can provide about that 02:03:28  
22 invasive questioning, as you put it. 02:03:32

23 MR. KOHLI: Objection, form. 02:03:34

24 THE WITNESS: Can you be more specific in 02:03:45  
25 what -- in what context you're describing? 02:03:58

1 BY MR. JONES:

2 Q. Yes. Well, it's your declaration which  
3 states that you faced "invasive questioning." And my  
4 question to you is, what details do you remember  
5 about that invasive questioning, as you put it?

6 A. I remember in the passport office, the agent  
7 questioned my birth certificate. He pointed out that  
8 the man -- the gender did not match my identification  
9 documents, and he was asking why this document I  
10 needed to prove my identity did not match my name.  
11 And at that point, I had to explain Tennessee's  
12 policy.

13 I found that quite invasive. I found that to  
14 be close in the sense that this was already a  
15 delicate process for me, that I felt it was already  
16 well in line with expectations, but also because I  
17 felt I had to justify Tennessee's policy in this  
18 case.

19 Q. And this was at the DMV or whatever it's  
20 called in [REDACTED]?

21 A. No. The incident I was just describing was  
22 at the passport office.

23 Q. Oh, the passport office, I'm sorry. But that  
24 passport office, was that in [REDACTED]?

25 A. Yes.

1	Q.	Any other details you remember about that	02:05:49
2		incident with the person at the passport office?	02:05:54
3		MR. KOHLI: Objection, form.	02:06:01
4		THE WITNESS: What sort of details?	02:06:05
5	BY MR. JONES:		02:06:06
6	Q.	Anything you can provide.	02:06:07
7		MR. KOHLI: Objection, form.	02:06:08
8		THE WITNESS: I'm not sure I can answer	02:06:18
9		without a more specific question.	02:06:19
10	BY MR. JONES:		02:06:22
11	Q.	Okay. Then let's move on to the driver's	02:06:22
12		license.	02:06:31
13		What can -- what do you mean by invasive	02:06:31
14		questioning, as it states here in Paragraph 20 of	02:06:34
15		your declaration, regarding your driver's license?	02:06:39
16	A.	I don't recall as much the incident through	02:06:42
17		the process of changing my driver's license at that	02:06:53
18		time. I recall that I had my birth certificate with	02:06:55
19		me.	02:06:59
20	Q.	And you also, at that time, had the court	02:07:02
21		order which allowed you to change your name and	02:07:05
22		gender, correct?	02:07:08
23	A.	Yes.	02:07:10
24	Q.	Now, you have testified that you had to	02:07:12
25		explain, I believe is the word that you used,	02:07:27

1 Tennessee's birth certificate policy. My question  
2 is, first of all, explain -- explain what you mean by  
3 Tennessee's birth certificate policy.

4 MR. KOHLI: Objection, form.

5 THE WITNESS: I mean, in particular, that  
6 it was unable to be updated.

7 BY MR. JONES:

8 Q. When did you first become aware of  
9 Tennessee's birth certificate policy?

10 A. I became aware of it in the process of  
11 updating my identity documents. There are standard  
12 resources on how -- describing how to update my --  
13 all documents and to update documents such as birth  
14 certificates.

15 I recall the times that I was searching  
16 frantically, trying to understand how to update  
17 Tennessee -- my birth certificate, and that is when I  
18 first discovered Tennessee's full exclusion of  
19 transgender people. And I recall being quite  
20 shocked, given that it's so unique in terms of  
21 states, as well as nationally -- internationally.

22 Q. And how -- if you recall, how did you  
23 actually learn about the birth certificate policy?

24 A. I believe I just answered that. Sorry.

25 Q. You have to be more specific. I mean, did

1 you do your own research or did someone else provide 02:09:53  
2 you with information about the policy, if you recall? 02:09:58

3 A. I forget what my initial source was. I did 02:10:06  
4 my own research at some point. I recall using the 02:10:09  
5 Transgender Law Center's identity documents as a 02:10:14  
6 general resource. 02:10:20

7 Q. What is the Transgender Law Center? 02:10:22

8 A. I'm not sure I can personally explain it 02:10:31  
9 well, but it is a law center that provides resources 02:10:37  
10 for transgender people. 02:10:41

11 Q. And is that there in [REDACTED]? 02:10:44

12 A. I believe it's based in Oakland. 02:10:49

13 Q. Is this an online resource or you actually 02:10:56  
14 visited an office? 02:11:05

15 A. It was an online resource intended to be of 02:11:10  
16 national use. 02:11:13

17 Q. You mentioned previously that the person you 02:11:17  
18 were in a relationship with is transgender. How many 02:11:41  
19 transgender people do you know? 02:11:47

20 MR. KOHLI: Objection, form. 02:11:51

21 THE WITNESS: I don't think I can answer 02:11:58  
22 that question. Given my own status, I -- I don't 02:12:00  
23 identify my transgender status outside of people I 02:12:05  
24 trust, who are largely close friends and other 02:12:10  
25 situations such as that. I don't know everyone that 02:12:16

1 I come in contact with is transgender because they 02:12:20  
2 don't identify themselves to be as transgender in all 02:12:23  
3 cases. 02:12:27

4 BY MR. JONES: 02:12:27

5 Q. Are you, yourself, a part of a transgender 02:12:33  
6 community? 02:12:34

7 A. I'm not sure what you mean with that 02:12:38  
8 question. 02:12:49

9 Q. Do you -- now, you say that you've utilized 02:12:49  
10 the services of the Transgender Law Center. Are 02:12:55  
11 there any other organizations, organizations that 02:12:59  
12 work with transgender issues, with whom you have 02:13:06  
13 participated? 02:13:12

14 MR. KOHLI: Objection, form. 02:13:14

15 THE WITNESS: What do you mean by 02:13:19  
16 participate? 02:13:21

17 BY MR. JONES: 02:13:22

18 Q. That you've contacted, that you've gone to 02:13:22  
19 any meetings of, that you have socialized through, 02:13:25  
20 any sort of contact like that? 02:13:31

21 MR. KOHLI: Objection, form. 02:13:36

22 THE WITNESS: I'm not sure I can answer 02:13:47  
23 that question. I've donated to a few organizations. 02:13:48  
24 I have contacted a handful. I don't have full 02:13:53  
25 recollection of those interactions. 02:13:56

1	BY MR. JONES:	02:13:59
2	Q. Are you a member of any organization that's	02:14:00
3	devoted to transgender issues?	02:14:01
4	A. I don't know if I'm a formal member. As I	02:14:18
5	said, I donate to organizations. It might mean that	02:14:22
6	I'm a member in some form.	02:14:27
7	Q. Okay. Who -- what are those organizations	02:14:29
8	that you've donated to?	02:14:30
9	MR. KOHLI: Objection, form.	02:14:35
10	THE WITNESS: Can you be more specific by	02:14:37
11	what organization you mean? You mean organizations	02:14:39
12	that might have any relevance to transgender issues	02:14:44
13	or --	02:14:47
14	BY MR. JONES:	02:14:47
15	Q. Yes. Yes, any organization that you have	02:14:47
16	donated to that may in some form address transgender	02:14:50
17	issues.	02:14:58
18	MR. KOHLI: Objection, form.	02:15:00
19	THE WITNESS: I feel that's too broad for	02:15:15
20	me to answer. I can't -- can you be specific about	02:15:16
21	what type of issues?	02:15:22
22	BY MR. JONES:	02:15:24
23	Q. Well, you testified that there were some	02:15:25
24	organizations that you donated to. And I'm just	02:15:27
25	wondering what organizations you had in mind when you	02:15:31



1	answered that question.	02:15:34
2	A. I think primarily Transgender Law Center,	02:15:39
3	Liability Goals, and the ACLU.	02:15:45
4	Q. What is your understanding of the term --	02:16:07
5	terms "gender identity"?	02:16:14
6	MR. KOHLI: It's subject to the standing	02:16:18
7	objection --	02:16:23
8	MR. JONES: Yes.	02:16:25
9	THE WITNESS: I'm not an expert on such	02:16:26
10	terms. I use terms such as gender identity, gender,	02:16:29
11	and sex interchangeably.	02:16:33
12	MR. KOHLI: We've been going for an hour.	02:16:52
13	Just wanted to check with the witness if she'll need	02:16:54
14	a break, or are you good?	02:16:56
15	THE WITNESS: I'm okay at the moment. A	02:17:03
16	break in a little bit would be good.	02:17:05
17	MR. JONES: Okay. I may not have that	02:17:05
18	much more. I know that's a lie attorneys tell, but	02:17:07
19	I'll try to speed it up.	02:17:13
20	BY MR. JONES:	02:17:21
21	Q. Looking at Paragraph 168 of the complaint,	02:17:23
22	the amended complaint, the paragraph states, "K.N.	02:17:28
23	objects to the State's message that sex is determined	02:17:38
24	solely by the appearance of external genitals at the	02:17:41
25	time of birth, a message that is inconsistent with	02:17:46

1	scientific and medical understanding of sex."	02:17:52
2	Did I read that correctly?	02:17:54
3	A. Yes, I believe you did.	02:17:57
4	Q. Okay. And my question to you is, do you	02:18:02
5	intend to render any opinions about what the	02:18:09
6	scientific or medical understanding of sex is?	02:18:13
7	A. I am not an expert in that field.	02:18:18
8	Q. I know I had asked a question before about	02:18:25
9	how many, but I'll ask it more generally. Besides	02:18:37
10	the person that you're in a relationship with, do you	02:18:45
11	have any friends or acquaintances who you know are	02:18:48
12	transgender or have a sex that's incongruent with	02:18:55
13	their gender identity?	02:19:00
14	A. Can you be more specific by what you mean by	02:19:03
15	friends?	02:19:15
16	Q. Friends or acquaintances, people that you	02:19:16
17	know, whether, you know, they -- assuming that they	02:19:20
18	disclose their status, do you have friends or	02:19:26
19	acquaintances who you know are transgender or have	02:19:29
20	sex incongruent with the gender identity?	02:19:33
21	MR. KOHLI: Objection, form.	02:19:40
22	THE WITNESS: I'm not sure I'm	02:19:47
23	comfortable in answering that. I'm not certain --	02:19:48
24	there are certain people I know who are trans who	02:19:52
25	have not necessarily come out to me, simply because I	02:19:55

1	can -- I can identify certain features.	02:19:58
2	BY MR. JONES:	02:20:02
3	Q. I understand.	02:20:02
4	Do you know -- do you have any friends or	02:20:06
5	acquaintances who self identify with a gender	02:20:10
6	identity that is neither male nor female?	02:20:18
7	A. Yes.	02:20:29
8	Q. And how does that person or do those people,	02:20:30
9	how do they identify themselves?	02:20:35
10	A. I don't necessarily know how they identify.	02:20:49
11	I know they prefer "they," "them" pronouns.	02:20:52
12	THE WITNESS: I would ask that we take a	02:20:56
13	break at this point.	02:20:59
14	MR. JONES: Okay, great. Five minutes	02:20:59
15	enough or ten minutes or --	02:21:01
16	THE WITNESS: Five minutes should be	02:21:03
17	enough.	02:21:05
18	MR. JONES: Okay, great. Back in five	02:21:05
19	minutes. Off the record.	02:21:07
20	(Short break.)	02:21:09
21	BY MR. JONES:	02:21:09
22	Q. When was the last time that you had to show	02:29:55
23	your birth certificate to anyone for official reason,	02:29:58
24	not just to show it to an acquaintance, but when was	02:30:04
25	the last time you had to show your birth certificate	02:30:08

as an identity document?

A. I believe when updating identity documents in 2017. I have avoided using my birth certificate, given that it does not correctly identify me.

Q. And you were able to obtain employment, at least this last time, without your birth certificate; is that right?

MR. KOHLI: Objection, form.

THE WITNESS: I had other documents that were sufficient for the citizenship tests at my last employment; however, I feel that my birth certificate ultimately is in the chain of identity documents that I did use obtaining my passport.

BY MR. JONES:

Q. Where is your birth certificate now?

A. I have a copy of it in a box by our safe in our bedroom, along with other identity documents.

Q. I'm looking at Paragraph 164 of the amended complaint, which states, and I'll read it, "K.N. is personally aware of the high incidence of violence and harassment directed at transgender persons."

And I'll just stop there. There's another phrase, but I'd like to know what you personally know about a high incidence of violence and harassment directed at transgender persons.

1 MR. KOHLI: Objection, form. 02:32:12

2 THE WITNESS: When you say personally 02:32:17

3 know, can you be more specific about what information 02:32:18

4 you're seeking? 02:32:21

5 BY MR. JONES: 02:32:22

6 Q. Well, this is the complaint, the amended 02:32:23

7 complaint in this cause, and this statement is 02:32:26

8 attributed to you. It says, "K.N. is personally 02:32:31

9 aware of the high incidence of violence and 02:32:34

10 harassment directed at transgender persons." 02:32:38

11 Since that statement is attributable to you, 02:32:43

12 my question to you is, what personal knowledge do you 02:32:45

13 have about that -- those issues? 02:32:49

14 A. I would say it's multifold. On one hand, I 02:32:53

15 have personally been harassed multiple occasions. I 02:33:02

16 have been physically threatened. My girlfriend has 02:33:06

17 been assaulted, generally in occasions where it was 02:33:10

18 clear the reason was solely because I am trans or 02:33:14

19 that she is trans. 02:33:17

20 I also follow news media around instance of 02:33:20

21 violence towards trans people. I'm aware of the 02:33:26

22 murders that are directed at trans -- murders that 02:33:30

23 are hate crimes as a result of someone's trans 02:33:34

24 status. And I am aware of situations of violence 02:33:37

25 that I need to avoid because of those common 02:33:42

1 incidents. And I would say, too, I have used those  
2 cautions to my own good to prevent violence.

3 Q. Have you ever been subjected to violence or  
4 harassment as a result of showing your birth  
5 certificate?

6 A. I described the incidence already where I  
7 showed my birth certificate. I was not physically  
8 assaulted in those instances, but I did feel a  
9 certain violence just in the violation that I did  
10 need to justify the documents.

11 I would also say I have seen harassment for  
12 showing identity documents that do ultimately stem  
13 from my birth certificate.

14 Q. And explain what you mean by that.

15 A. I have a -- before I was able to update the  
16 details like credit cards, my driver's license,  
17 etcetera, I had to use documents that were using  
18 terms that were from my birth certificate, such as my  
19 name and the gender assigned to me at birth. And I  
20 was harassed in instances where I had to use these  
21 just to go about my life. It's not directly showing  
22 my birth certificate, but I feel it stems from it.

23 Q. And what documents were those, your driver's  
24 license or what?

25 A. It would have largely been my driver's

1 license or credit card.

02:35:37

2 Q. And I'm looking at Paragraph 19 of your  
3 declaration. It says you reasonably fear that  
4 possessing a birth certificate that fails to match  
5 your gender identity increases the chances that you  
6 will be subjected to invasions of privacy, prejudice,  
7 discrimination, distress, harassment or violence and  
8 that you have taken steps to reduce those risks.

02:35:40

02:36:03

02:36:18

02:36:22

02:36:25

02:36:29

02:36:34

9 My question to you based on that statement  
10 is, when do you anticipate in the future that you may  
11 have to show your birth certificate to anyone?

02:36:40

02:36:44

02:36:52

12 MR. KOHLI: Objection, form, calls for  
13 speculation.

02:36:56

02:36:59

14 THE WITNESS: I don't have a full account  
15 of all instances in which I might need to show my  
16 birth certificate. I feel that is speculative.

02:37:10

02:37:11

02:37:14

17 Something that comes to mind would be  
18 going back to the DMV to update my driver's license  
19 for real ID requirements. That would be in the near  
20 future. I'm not sure how near, given the COVID  
21 crisis.

02:37:19

02:37:21

02:37:25

02:37:29

02:37:36

22 I would say to that point, I don't know  
23 all instances in which my birth certificate could be  
24 obtained, and I don't know in which instances it  
25 might come back to me. I've taken great efforts to

02:37:37

02:37:43

02:37:47

02:37:49

1 change my -- any identifying information using my 02:37:53  
2 pre -- my full name, or what I sometimes refer to as 02:37:57  
3 dead name, everywhere I could find online or 02:38:01  
4 elsewhere. 02:38:06

5 BY MR. JONES: 02:38:14

6 Q. When was the last time that you were in the 02:38:14  
7 state of Tennessee? 02:38:20

8 A. I'm not sure I recall the exact time, but I 02:38:20  
9 believe it was 2014 or 2015. 02:38:33

10 Q. And so why did you -- and I don't want to 02:38:37  
11 know anything that you discussed with your lawyers, 02:39:11  
12 so no communications with your lawyers, but you 02:39:13  
13 personally, why did you decide to become involved in 02:39:16  
14 this lawsuit? 02:39:22

15 MR. KOHLI: Objection, and only to the 02:39:23  
16 extent that you can do so without revealing any 02:39:26  
17 communications you've had with the lawyers. 02:39:29

18 THE WITNESS: I would say I initially was 02:39:39  
19 interested because I was aware of Tennessee's policy. 02:39:45  
20 I found it unfathomable, to be honest. I don't know 02:39:49  
21 how a policy like this can still exist. I find it 02:39:55  
22 extremely discriminatory. 02:39:58

23 I personally was motivated to become 02:40:03  
24 involved simply because I want to update my own birth 02:40:09  
25 certificate, and I believe that's enough reason on 02:40:16



1 one hand, but I -- I find the policy unfathomable. 02:40:18

2 MR. JONES: Okay. I will pass the 02:40:27  
3 witness if you have any questions. 02:40:30

4 MR. KOHLI: So we don't have any 02:40:32  
5 questions. I just wanted to put it on the record 02:40:34  
6 that we will need confidentiality designations for 02:40:36  
7 both personal and medical information that was sought 02:40:40  
8 during the deposition. And we also reserve the right 02:40:43  
9 to review and sign the deposition. 02:40:47

10 MR. JONES: Thank you. 02:41:00

11 THE REPORTER: Would you like the whole 02:41:00  
12 transcript confidential? 02:41:08

13 MR. KOHLI: For now, I think we -- you 02:41:08  
14 know, we want to identify whether it's confidential 02:41:10  
15 or AEO. So maybe we go with the highest 02:41:16  
16 confidentiality for now, and then we can come back 02:41:20  
17 and visit it. 02:41:22

18 Is that okay, Matt? 02:41:23

19 MR. JONES: That's okay. 02:41:23

20 MR. KOHLI: Okay, so go with AEO for now. 02:41:26

21 MR. JONES: A caveat to that is we may 02:41:31  
22 have to revisit that quickly in light of -- I'm not 02:41:35  
23 sure if there's anything, but if there is anything 02:41:40  
24 that we need to put in our response to the motion for 02:41:43  
25 summary judgement, I have to expedite that 02:41:44

1 designation process. But again, I'm not positive 02:41:50  
2 that that's the case. I don't know that we'll have 02:41:53  
3 the transcript by then, so I just wanted you to -- I 02:41:56  
4 want you to be aware of that. 02:42:02

5 MR. KOHLI: Okay, sounds good. 02:42:03

6 MR. GONZALEZ-PAGAN: And Matt? 02:42:06

7 MR. JONES: Yes. 02:42:06

8 MR. GONZALEZ-PAGAN: This is Omar from 02:42:06  
9 Lambda. To that end, I just wanted to make sure we 02:42:08  
10 ask for a rough of these transcripts so we can have 02:42:11  
11 something in case you all decide to use the 02:42:16  
12 transcript. So I was just wondering for the court 02:42:21  
13 reporter if we -- when would be the estimate that we 02:42:25  
14 could get one. 02:42:27

15 THE REPORTER: My question was, did you 02:42:40  
16 want to order this expedited, Mr. Jones? 02:42:40

17 MR. JONES: I think we should -- 02:42:45

18 THE REPORTER: And when would you like it 02:42:45  
19 expedited as well? 02:42:45

20 MR. JONES: -- in light of our deadline 02:42:45  
21 that's coming up. 02:42:46

22 THE REPORTER: And I have on the e-mail  
23 the 14th. Is that when you would like it?

24 MR. JONES: Yeah, that should be good.

25 THE REPORTER: And for the Plaintiffs'

1 attorneys, is Mr. Kohli, is that when you would like  
2 it, on the 14th, the full copy?

3 MR. KOHLI: Sure.

02:43:07

4 FURTHER DEPONENT SAITH NOT  
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1 REPORTER'S CERTIFICATE

2  
3 STATE OF TENNESSEE

4 COUNTY OF SUMNER

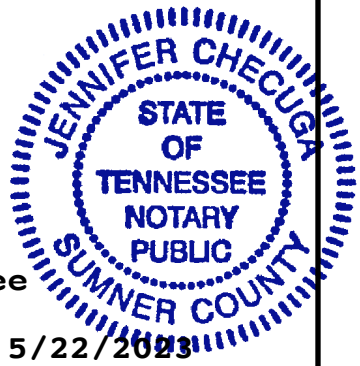
5 I, JENNY CHECUGA, Licensed Court Reporter,  
6 with offices in Nashville, Tennessee, and Registered  
7 Professional Reporter, hereby certify that I reported  
8 the foregoing teleconference deposition of K.N. by  
9 machine shorthand to the best of my skills and  
10 abilities, and thereafter the same was reduced to  
11 typewritten form by me.

12 I further certify that I am not related to  
13 any of the parties named herein, nor their counsel,  
14 and have no interest, financial or otherwise, in the  
15 outcome of the proceedings.

16 I further certify that in order for this  
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E R R A T A   P A G E

I, K.N., having read the foregoing deposition, Pages 1 through 49, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

PAGE	LINE	SHOULD HAVE BEEN
16	6	remove "popping"
17	10	"negative" should be "bigoted"
18	15	"I'm in a little bit of contact with them" should be
		"limited contact with my parents"
22	9	"business" should be "systems"
23	20-22	remove "fairly"
29	7	████████████████████
33	8	"man" should be "agent"
35	12	"all documents" should be "id documents"
35	21	"nationally - internationally" should be "nationally and
		internationally"
35	16-17	"how to update Tennessee - my birth certificate" should be
		"how to update my birth certificate with Tennessee"

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E R R A T A P A G E

I, K.N., having read the foregoing deposition, Pages 1 through 49, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

PAGE	LINE	SHOULD HAVE BEEN
39	3	"Liability Goals" should be "Lambda Legal"
41	11	"they, them" should be "they/them"
42	16	"box by our safe" should be "fire safe"
46	2	"my full name" should be "my previous name"

K N  
K.N.

Notary Public  
My Commission Expires:

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

KAYLA GORE, JAIME COMBS, L.G., and  
K.N.,

*Plaintiffs,*

v.

WILIAM BYRON LEE, in his official  
capacity as Governor of the State of  
Tennessee and LISA PIERCEY, in her  
official capacity as Commissioner of the  
Tennessee Department of Health,

*Defendants.*

Case No. 3:19-cv-00328

Judge Eli J. Richardson  
Magistrate Judge Barbara Holmes

**ERRATA DECLARATION**

I, K.N., having read the foregoing transcript of my deposition taken on May 12, 2020, pages 1 through 49, do hereby certify under penalty of perjury under the laws of the United States of America that said deposition testimony is a true and accurate transcript, with the changes detailed on the attached errata page.

Executed on this 14 day of May 2020.

K N

K.N.



<hr/> <b>Exhibits</b> <hr/>	<b>29</b> 12:3	<b>alive</b> 18:10	19 23:7 29:17 41:18 45:18,25 47:16
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